

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION

IN RE: NATIONAL PRESCRIPTION  
OPIATE LITIGATION

*This document relates to:*

*All Cases Noted on Attached Appendix A*

MDL No. 2804

Case No. 1:17-md-2804

JUDGE DAN AARON POLSTER

**MASTER STIPULATION AND [PROPOSED] ORDER  
DISMISSING WITH PREJUDICE CLAIMS  
PURSUANT TO TEVA GLOBAL OPIOID SETTLEMENT AGREEMENT**

IT IS HEREBY STIPULATED AND AGREED, by and between the undersigned counsel of record for the Plaintiff Subdivisions identified in Appendix A (collectively, the “Dismissing Plaintiffs”) and the Teva Defendants<sup>1</sup> that, pursuant to the election of each Dismissing Plaintiff to participate in the Teva Global Opioid Settlement Agreement (the “Teva Settlement Agreement”), which is dated February 8, 2023, and is binding on the Dismissing Plaintiffs and the Teva Defendants, and which has an Effective Date of August 7, 2023 (a copy of which is attached as Appendix B), all claims of each Dismissing Plaintiff against any Teva Defendant, including any entity identified on the attached Appendix C, are hereby voluntarily **DISMISSED WITH**

---

<sup>1</sup> The Teva Defendants are each and every “Released Entity” as set forth in Section I and Exhibit J of the Teva Settlement Agreement, dated as of February 8, 2023, a copy of which is attached as Appendix B. Appendix C, also attached hereto, represents a good faith effort by the Teva Defendants to list all Released Entities that may be individually named in any of the Dismissing Plaintiffs’ complaints. Appendix C is not intended to limit the scope of Released Entities, and to the extent that Dismissing Plaintiffs or Teva Defendants subsequently identify any Released Entity that should have been included on Appendix C, they will inform the Clerk of the Court.

**PREJUDICE**, with each party to bear its own costs. The Court shall retain jurisdiction with respect to the Teva Settlement Agreement to the extent provided under that Agreement.<sup>2</sup>

Dated: July 24, 2023

Agreed as to form and substance:

Respectfully submitted,

/s/Jayne Conroy  
Jayne Conroy  
SIMMONS HANLY CONROY  
112 Madison Avenue, 7th Floor  
New York, NY 10016  
(212) 784-6400  
(212) 213-5949 (fax)  
jconroy@simmonsfirm.com

/s/Joseph F. Rice  
Joseph F. Rice  
MOTLEY RICE LLC  
28 Bridgeside Blvd.  
Mt. Pleasant, SC 29464  
(843) 216-9000  
(843) 216-9290 (Fax)  
jrice@motleyrice.com

/s/Paul T. Farrell, Jr.  
Paul T. Farrell, Jr., Esq.  
FARRELL & FULLER LLC  
1311 Ponce de Leone Ave., Suite 202  
San Juan, PR 00907  
(304)654-8281  
paul@farrellfuller.com

*Plaintiffs' Co-Lead Counsel*

---

<sup>2</sup> To the extent any Plaintiff Subdivision is inadvertently included on Appendix A, the Court retains jurisdiction to hear those disputes. In advance of raising any such issue with the Court, the Plaintiff Subdivision must meet and confer with defense counsel and Plaintiffs' Liaison Counsel.

/s/Peter H. Weinberger  
Peter H. Weinberger (0022076)  
SPANGENBERG SHIBLEY & LIBER  
1001 Lakeside Avenue East, Suite 1700  
Cleveland, OH 44114  
(216) 696-3232  
(216) 696-3924 (Fax)  
pweinberger@spanglaw.com

*Plaintiffs' Liaison Counsel*

**TEVA**

/s/ Eric W. Sitarchuk  
Eric W. Sitarchuk  
Rebecca J. Hillyer  
MORGAN LEWIS & BOCKIUS LLP  
1701 Market Street  
Philadelphia, PA 19103-2921  
eric.sitarchuk@morganlewis.com  
rebecca.hillyer@morganlewis.com  
(215) 963-5000

*Attorneys for Teva*

SO ORDERED this \_\_\_ day of \_\_\_\_\_, 2023.

\_\_\_\_\_  
Hon. Dan Aaron Polster  
United States District Judge

**CERTIFICATE OF SERVICE**

I hereby certify that on July 24, 2023, I electronically filed the foregoing with the Clerk of Court by using the CM/ECF system. Copies will be served upon counsel of record by, and may be obtained through, the Court CM/ECF system.

/s/Peter H. Weinberger  
Peter H. Weinberger